

EXHIBIT “Q”

<p style="text-align: right;">Page 1</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE MIDDLE DISTRICT OF ALABAMA 3 NORTHERN DIVISION 4 5 PIONEER SERVICES, INC., 6 Plaintiff, 7 Vs CIVIL ACTION NO 2:06CV377-WKW 8 AUTO-OWNERS INSURANCE COMPANY, INC., et al., 9 Defendant 10 11 ***** 12 13 VIDEO TAPED DEPOSITION OF JIMMY WILLIAMSON, 14 taken pursuant to stipulation and agreement before 15 Lisa J Nix, Registered Professional Reporter and 16 Commissioner for the State of Alabama at Large, in 17 the Law Offices of Enzor & Enzor, 208 Dunson 18 Street, Andalusia, Alabama on Friday, January 26, 19 2007, commencing at approximately 10:10 p m 20 21 ***** 22 23</p>	<p style="text-align: right;">Page 3</p> <p>1 STIPULATION 2 It is hereby stipulated and agreed by and 3 between counsel representing the parties that the 4 deposition of JIMMY WILLIAMSON is taken pursuant to 5 the Federal Rules of Civil Procedure and that said 6 deposition may be taken before Lisa J Nix, 7 Registered Professional Reporter and Commissioner 8 for the State of Alabama at Large, without the 9 formality of a commission, that objections to 10 questions other than objections as to the form of 11 the question need not be made at this time but may 12 be reserved for a ruling at such time as the said 13 deposition may be offered in evidence or used for 14 any other purpose by either party provided for by 15 the Statute. 16 It is further stipulated and agreed by and 17 between counsel representing the parties in this 18 case that the filing of said deposition is hereby 19 waived and may be introduced at the trial of this 20 case or used in any other manner by either party 21 hereto provided for by the Statute regardless of 22 the waiving of the filing of the same 23 It is further stipulated and agreed by and</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES 2 3 FOR THE PLAINTIFF: 4 Mr. Harry P. Hall II 5 FARMER, PRICE, HORNSBY & WEATHERFORD 6 Attorneys at Law 7 100 Adris Place 8 Post Office Drawer 2228 9 Dothan, AL 36302 10 11 FOR THE DEFENDANT: 12 Mr. Joel H. Pearson 13 MORROW, ROMINE & PEARSON, P C 14 Attorneys at Law 15 122 South Hull Street 16 Montgomery, AL 36104 17 18 AI SO PRESENT: Vic Griswold, Videographer 19 20 ***** 21 22 EXAMINATION INDEX 23 24 JIMMY WILLIAMSON 25 BY MR PEARSON 5 26 EXHIBIT INDEX 27 MAR 28 DEFENDANT'S EXHIBIT 29 1 Secretary of State corporate detail page 17 30 2 Documents Bats stamped Pioneer 01 - 357 77 31 3 Documents Bats stamped A000001 - 000299 150 32 33</p>	<p style="text-align: right;">Page 4</p> <p>1 between the parties hereto and the witness that the 2 signature of the witness to this deposition is 3 hereby waived 4 5 ***** 6 7 VIDEOGRAPHER: This is the 8 deposition of Jimmy Williamson 9 taken in the matter of Pioneer 10 Services, Incorporated, 11 plaintiff, versus Auto-Owners 12 Insurance Company, 13 Incorporated, et al , 14 defendants, Case Number 15 2:06CV377-WKW held in the 16 United States District Court 17 for the Middle District of 18 Alabama, Northern Division 19 Today is January 26, 20 2007. We're at the offices of 21 Enzor and Enzor in Andalusia, 22 Alabama The local time is 23 10:12 a m If counsel would</p>

January 26, 2007

Deposition of Jimmy Williamson

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<p>1 at the Pioneer documents we had</p> <p>2 181 through 184 is one of them. That's</p> <p>3 one of the documents I want you to look</p> <p>4 at And the other is 274, 275, and the</p> <p>5 sequential pages following that</p> <p>6 A There's 274.</p> <p>7 Q Yeah, I'm looking for the rest of it</p> <p>8 In any event, the documents that are</p> <p>9 marked-- the page beginning AO274 and the</p> <p>10 page beginning AO181, those are documents</p> <p>11 you took to -- well, that you prepared</p> <p>12 regarding the damage to the property at</p> <p>13 Pioneer Telephone Services, aren't they?</p> <p>14 A Yes, sir This was the contents</p> <p>15 Q Okay What I want to ask you about is, on</p> <p>16 those contents, is that the first documents</p> <p>17 you gave to anyone from the agency or</p> <p>18 anyone regarding Auto-Owners Insurance or</p> <p>19 gave to somebody else regarding your</p> <p>20 contents claims?</p> <p>21 A The one that -- if this -- if this is it, I</p> <p>22 mean, I'm sure I gave it to South Central</p> <p>23 Agency I walked it over</p>	<p>1 you presented to Auto-Owners or somebody</p> <p>2 else to get to Auto-Owners regarding</p> <p>3 contents claims</p> <p>4 A It looks like them. I would say, yes,</p> <p>5 sir I mean, I'm just I believe it is.</p> <p>6 Q We've talked about earlier some lightning</p> <p>7 affidavits you did, but did you submit</p> <p>8 those before or after those invoices?</p> <p>9 A Those were done -- We always try to do them</p> <p>10 the same time when we do it.</p> <p>11 Q The document marked invoice, AO181, and the</p> <p>12 document marked quotation, AO274, do you</p> <p>13 know if you did those before, after, or at</p> <p>14 the same time as the documents -- the</p> <p>15 lightning affidavits?</p> <p>16 A I'm not sure Sheila did it Usually</p> <p>17 as -- when we know we have -- or there's</p> <p>18 going to be a claim involved, the affidavit</p> <p>19 is actually done -- the item numbers is</p> <p>20 actually done off of the invoice when -- we</p> <p>21 try to keep everything the same.</p> <p>22 Q And do you know the date that you took</p> <p>23 those items or the date you first took any</p>
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<p>1 Q Okay When you say it, you mean both the</p> <p>2 document AO274 and the document that starts</p> <p>3 AO181, correct?</p> <p>4 A I guess so. I'm not -- I'm not sure if</p> <p>5 both of them went the same -- I think, if</p> <p>6 I'm not badly mistaken, I knew the</p> <p>7 lightning stuff And I don't think I -- I</p> <p>8 may not have gone through the water</p> <p>9 damage -- all of the water damage stuff yet</p> <p>10 because we were so busy with other</p> <p>11 customers</p> <p>12 Because I had to go through all this</p> <p>13 because the stuff was in boxes I did not</p> <p>14 know exactly what was in it But I do know</p> <p>15 the lightning stuff went -- I believe went</p> <p>16 first</p> <p>17 It's like I said, it's all so crazy, we</p> <p>18 were so busy trying to take care of</p> <p>19 everybody else</p> <p>20 Q Well, what I want to know is when you</p> <p>21 presented those documents there, I want to</p> <p>22 know first of all, are those -- to your</p> <p>23 recollection, are those the first documents</p>	<p>1 item to South Central Agency regarding</p> <p>2 contents?</p> <p>3 A No, sir, I don't -- I don't remember when I</p> <p>4 did that</p> <p>5 Q Was it on -- Was it on September 17th?</p> <p>6 A Oh, Lord, no.</p> <p>7 Q Okay</p> <p>8 A All they -- All that we knew was we just</p> <p>9 had a bunch of messed up stuff</p> <p>10 Q So it was sometime a good while after that?</p> <p>11 A Well, it wasn't a goodwhile. I would say</p> <p>12 a couple of weeks, maybe a week and a</p> <p>13 half Because we -- I mean, like I said,</p> <p>14 we had -- we had other customers, and we</p> <p>15 operated the first -- first three or four</p> <p>16 days, we operated off regular telephones,</p> <p>17 not even a business system</p> <p>18 Q Had you done it by the time you met with</p> <p>19 Mr. Gauthier?</p> <p>20 A Oh, yes, sir.</p> <p>21 Q You had taken the list to Harold -- to</p> <p>22 South Central Agency prior to that?</p> <p>23 A I believe we had And if not, it might</p>

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<p>1 have been right after. I know that I had</p> <p>2 told them that I was working on it, trying</p> <p>3 to get it, and they understood. They said</p> <p>4 they knew how it was</p> <p>5 Q And your best recollection is that it</p> <p>6 was -- is when in relation to September</p> <p>7 16th, 2004?</p> <p>8 A I'm just not sure. I mean-- I mean, if I</p> <p>9 was going to guess, what I'd say, three</p> <p>10 weeks, somewhere in there to be fair</p> <p>11 MR. HALL: Don't guess</p> <p>12 THE WITNESS: Okay</p> <p>13 A Well, I'm just not sure then</p> <p>14 Q Well, the two documents are dated. What is</p> <p>15 the date on these two documents marked</p> <p>16 AO181 and AO274?</p> <p>17 A October 29th, 2004.</p> <p>18 Q Let me -- I'm going to show you the</p> <p>19 lightning affidavit. You did one, and</p> <p>20 then -- let me show you what was -- I</p> <p>21 previously think we've been over it maybe.</p> <p>22 AO185, does this regard lightning or water</p> <p>23 here, these items?</p>	<p>1 keep this date -- because we have looked at</p> <p>2 it, but we haven't fully examined. It's as</p> <p>3 close as we can to the actual date of the</p> <p>4 problem</p> <p>5 Q That you started looking at it?</p> <p>6 A Yes, sir.</p> <p>7 Q Okay. And I guess what I'm getting at and</p> <p>8 what I'm asking you is, it was much</p> <p>9 closer -- it was probably October 29th,</p> <p>10 2004 when you presented this material to</p> <p>11 South Central Agency?</p> <p>12 A Again, I don't know. I mean, we've done --</p> <p>13 had to do this again. Got Sheila to -- The</p> <p>14 date could be wrong. I'm trying to</p> <p>15 remember</p> <p>16 Q You're welcome to look through any of these</p> <p>17 documents if you think something will help</p> <p>18 give you a better -- a better idea on that</p> <p>19 A I'll be glad to. I just don't know if --</p> <p>20 I'm going to say, I mean, it's close,</p> <p>21 because I know we were so busy with</p> <p>22 everything else</p> <p>23 Q And when you say it was close, it's close</p>
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<p>1 A Water</p> <p>2 Q Okay. And there, you've listed -- I want</p> <p>3 to ask you about that. It's got a date</p> <p>4 on -- that you did something on the 20th of</p> <p>5 September. You're not maintaining you</p> <p>6 presented that to anybody on the 20th of</p> <p>7 September, are you?</p> <p>8 A No, this is when I done a list. I hadn't</p> <p>9 checked anything. Why, I mean --</p> <p>10 Q Is that the date you started looking at</p> <p>11 stuff --</p> <p>12 A Yes, sir.</p> <p>13 Q -- and compiling it?</p> <p>14 A (Nods head up and down.)</p> <p>15 Q But it was sometime well after that that</p> <p>16 you submitted it?</p> <p>17 A Right</p> <p>18 Q Okay. And would the -- would the documents</p> <p>19 that are marked AO181 and AO274 have been</p> <p>20 presented prior to that -- I mean, yeah,</p> <p>21 prior to you submitting that?</p> <p>22 A What we do, and this is -- I'm doing it</p> <p>23 like we do everybody else's. We try to</p>	<p>1 to somewhere around October 29th, 2004 when</p> <p>2 you presented that to South Central Agency?</p> <p>3 A I believe -- what I'm saying is the -- You</p> <p>4 know, we reported the claim to them. But,</p> <p>5 now, you know -- I'm not making myself</p> <p>6 clear still.</p> <p>7 We reported the claim, of course, that</p> <p>8 day that it happened. But this may be when</p> <p>9 we actually got the figures to them, not</p> <p>10 actually the equipment. But this -- she</p> <p>11 may have done -- run this that day, typed</p> <p>12 it out where I had it done</p> <p>13 Q Well, that's what I'm asking you about is</p> <p>14 the day that you first submitted anything</p> <p>15 to Auto-Owners or to South Central Agency</p> <p>16 or Mr. Gauthier or Mr. Cleveland or anyone</p> <p>17 else that was looking at the claims</p> <p>18 regarding damaged contents at Pioneer</p> <p>19 Telephone Services</p> <p>20 A This -- when we done -- where is the</p> <p>21 Tel-Com? Let's see. Let's see. I think</p> <p>22 that we did this -- we done another with</p> <p>23 Pioneer when they -- Bill neglected</p>

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<p>1 A Yes, sir, I believe so.</p> <p>2 Q Do you know if it was after the second --</p> <p>3 second week of October?</p> <p>4 A No, sir.</p> <p>5 Q Do you know whether -- whether your first</p> <p>6 conversation with Mr. Reaves regarding</p> <p>7 contents or anyone with Auto-Owners</p> <p>8 regarding contents was in November?</p> <p>9 A It was before then.</p> <p>10 Q Do you know how long before then?</p> <p>11 A I mean, I believe -- I believe it was</p> <p>12 around the first week in October, second</p> <p>13 week in October, I believe.</p> <p>14 Q Okay. Do you recall when -- And then what</p> <p>15 was the next contact you had with anyone</p> <p>16 from Auto-Owners?</p> <p>17 A After I talked with Bill on the phone?</p> <p>18 Q Yeah. First of all, before you tell me</p> <p>19 about the next conversation, tell me what</p> <p>20 took place in that first conversation</p> <p>21 between you and Bill Reaves.</p> <p>22 A Not a whole lot. I mean, he just didn't</p> <p>23 talk much. He didn't respond much. You</p>	<p>1 A The Pioneer contents claim?</p> <p>2 Q Yes, sir.</p> <p>3 A Yes, sir.</p> <p>4 Q And then you told me not much went on in</p> <p>5 that first conversation, but y'all --</p> <p>6 apparently, you set up a time to meet</p> <p>7 approximately a week later?</p> <p>8 A Yes, sir, somewhere -- from what I</p> <p>9 remember, he said I'm going to be there</p> <p>10 this Tuesday. I don't remember exactly</p> <p>11 when the call was, but he was trying to</p> <p>12 schedule when he was down that way.</p> <p>13 Q Okay. And did you, in fact, meet at the</p> <p>14 time that he said he would be down there</p> <p>15 next?</p> <p>16 A Yes, sir.</p> <p>17 Q And did you meet at the premises of Pioneer</p> <p>18 Telephone Services?</p> <p>19 A No, sir. He came to the office, and then</p> <p>20 we went out to the -- to my shop at the</p> <p>21 house.</p> <p>22 Q To see the items that you had moved to that</p> <p>23 shop?</p>
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<p>1 know, he -- I hear you've got a claim. I</p> <p>2 said, yes, sir. When was a good time? I</p> <p>3 said anytime. And I believe it was on a</p> <p>4 Tuesday that he came.</p> <p>5 Q And you're talking about actually came to</p> <p>6 meet with you?</p> <p>7 A Yes, sir. I think it was the following</p> <p>8 week after I talked to him.</p> <p>9 Q Okay. Your recollection is that you met</p> <p>10 with him approximately one -- after your</p> <p>11 first conversation with Mr. Reaves, you met</p> <p>12 with him approximately one week later?</p> <p>13 A Yeah, somewhere in there, a week, two -- I</p> <p>14 mean, I think it was earlier than a week.</p> <p>15 I mean, it wasn't long after he called</p> <p>16 because he was ready to -- I think</p> <p>17 something -- he come -- he came over to the</p> <p>18 office every so often or something.</p> <p>19 Q And your recollection was that the call</p> <p>20 that you got from Bill Reaves was not that</p> <p>21 long after you went over and discussed the</p> <p>22 contents claim with John and Harold for the</p> <p>23 first time?</p>	<p>1 A Yes, sir. And I had it all, you know, laid</p> <p>2 out for him.</p> <p>3 Q And do you recall whether he took</p> <p>4 photographs out there at that time?</p> <p>5 A Yes, sir.</p> <p>6 Q He did?</p> <p>7 A Yes, sir.</p> <p>8 Q And tell me again looking at these photos</p> <p>9 which ones are pictures of items in your</p> <p>10 shop?</p> <p>11 A Here.</p> <p>12 Q Hold on for me just a minute.</p> <p>13 A Oh, I'm sorry.</p> <p>14 Q One is at the bottom of AO213.</p> <p>15 A All of the pictures on 213. All of the</p> <p>16 pictures on 273. All of the pictures on</p> <p>17 272, and the picture -- oh, the two</p> <p>18 pictures at the bottom of page 271. It's</p> <p>19 actually two pictures.</p> <p>20 Q All right. And all of those pictures that</p> <p>21 you've pointed out to me now appear to have</p> <p>22 a date stamp on the bottom of them of</p> <p>23 11-16-2004, don't they?</p>

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<p>1 A Yes, sir, I believe so.</p> <p>2 Q Does that help refresh your recollection</p> <p>3 that perhaps your meeting was with</p> <p>4 Mr Reaves on or about that time?</p> <p>5 A No, sir. I don't -- I couldn't tell you</p> <p>6 one way or the other on the date exactly.</p> <p>7 Q Okay.</p> <p>8 A And that is just a date that appears on a</p> <p>9 camera. It could have been -- for all I</p> <p>10 know, it could have been 10-16</p> <p>11 Q I'm not trying to put words in your mouth.</p> <p>12 I'm just asking you, showing you those</p> <p>13 pictures and asking you that. You don't</p> <p>14 have to agree with me. I'm just asking</p> <p>15 you, does that jog anything in your mind?</p> <p>16 A (Shakes head from side to side.)</p> <p>17 Q I understand what we're talking about</p> <p>18 here --</p> <p>19 A Uh-huh. (Positive response.)</p> <p>20 Q -- and the time frames you've given me, no</p> <p>21 specific dates, but we've talked about time</p> <p>22 frames.</p> <p>23 A Yes, sir.</p>	<p>1 That's a copy of this, I believe.</p> <p>2 Q Are all three of those pictures other than</p> <p>3 the one in the top left-hand corner at your</p> <p>4 shed?</p> <p>5 A I don't know about this one. This one</p> <p>6 here, I don't know about where that was</p> <p>7 taken.</p> <p>8 Q Okay. The next --</p> <p>9 A I don't even recognize that, what that is</p> <p>10 I recognize that. That's in my home.</p> <p>11 MR HALL: Wait for a question.</p> <p>12 Q What about the other items on the left</p> <p>13 picture of AO214?</p> <p>14 A Yes, sir.</p> <p>15 Q Do you recognize those?</p> <p>16 A Yes, sir.</p> <p>17 Q What are those?</p> <p>18 A That's Vodavi equipment.</p> <p>19 Q And do you recognize any of these?</p> <p>20 A I recognize this. I mean, I recognize the</p> <p>21 equipment, and this is a security system.</p> <p>22 Q All right. What discussions did you and</p> <p>23 Mr Reaves have on the date he was out</p>
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<p>1 Q But it's my understanding that you do</p> <p>2 recall that you met with Mr Reaves. He</p> <p>3 took pictures approximately one week after</p> <p>4 you spoke to him for the first time?</p> <p>5 A Sometime in there after we talked. He took</p> <p>6 pictures whenever we went to the house.</p> <p>7 Q Is that the only --</p> <p>8 A I'm sorry. The reason that I'm not sure,</p> <p>9 because I don't remember -- this picture</p> <p>10 here which is dated the same day, that is</p> <p>11 my carpet at my office. And I don't</p> <p>12 remember -- I don't remember -- oh, no,</p> <p>13 because Bill didn't do anything with my</p> <p>14 carpet. Mr Gauthier did with my carpet.</p> <p>15 Q Did you have equipment -- did you have</p> <p>16 contents -- Other than in your shed, did</p> <p>17 you have contents in the building, in the</p> <p>18 office at Pioneer that you were making</p> <p>19 contents claims on?</p> <p>20 A No, sir, not -- not to my recollection.</p> <p>21 Because after we got everything checked and</p> <p>22 done, I moved it all to the shop because we</p> <p>23 didn't have room.</p>	<p>1 there, the date you met with him at your</p> <p>2 shed?</p> <p>3 What I'm understanding is, y'all -- he</p> <p>4 met, maybe, you at your office, and y'all</p> <p>5 then proceeded to your shed?</p> <p>6 A Yes, sir, we drove out to the shed, the</p> <p>7 shop.</p> <p>8 Q Did he meet you in your office first?</p> <p>9 A I believe he did, yes, sir. I believe he</p> <p>10 came -- or either John called me and I went</p> <p>11 over to their office because he didn't know</p> <p>12 where I lived.</p> <p>13 Q Do you know if he looked at anything -- at</p> <p>14 anything in your office when he met with</p> <p>15 you the first time?</p> <p>16 A I don't remember.</p> <p>17 Q All right. Now, then, tell me everything</p> <p>18 you and he discussed during your meeting.</p> <p>19 A We got there, and I showed him where</p> <p>20 everything was. And we -- I stood around</p> <p>21 and let him look at stuff. He opened a</p> <p>22 couple of boxes. He took a few pictures.</p> <p>23 He actually seemed more interested in what</p>

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<p>1 I had in the shop -- I'm talking about 2 other -- my other items than the 3 equipment 4 And in a moment, he asked me was there 5 any salvageable parts. And I thought it 6 was very strange the way things were 7 going. Very few words. And then when he 8 asked me about salvageable parts, I told 9 him no, sir. 10 Do you want me to go on? 11 Q I want to know every -- every conversation 12 that you and he had 13 A Okay 14 Q As far as what you noticed or this and that 15 and the other -- what I'm specifically 16 asking you about is the conversations, what 17 you said to him and what he said to you 18 during your meeting 19 A Okay 20 Q That's all I want to hear from you 21 A Okay 22 Q If you want to expand on it and say other 23 stuff -- I'm trying to give you leeway to</p>	<p>1 take it and load it up, and he said, no -- 2 Q Your entire shed of -- your entire shed of 3 equipment? 4 A Well, the corner here. It was just this 5 corner. 6 That I'd be glad to do what I needed 7 to, that I needed the space. And he said 8 that, no, he didn't need to take it. And I 9 don't really remember if he -- I think he 10 said he would be back in touch, something 11 to that effect, and I never heard from him 12 again. To the best of my knowledge, it was 13 only through John Tomberlin and Harold 14 Young. 15 Q Okay. Have you told me everything that 16 took place and was discussed between you 17 and Mr. Reaves in that -- in that 18 conversation that you had at your first 19 meeting? 20 A Let me think. Let me make sure I didn't 21 miss anything. 22 Yes, sir, I believe so. 23 Q Okay. Did you meet with Mr. Reaves after</p>
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<p>1 do it because I'm not trying to cut you 2 off. 3 A Okay 4 Q But my specific question is what he said to 5 you and what you said to him during your 6 meeting 7 A Okay 8 Q And that's all I want to know 9 A Okay. We -- After I stood there and 10 watched, he asked me was there any 11 salvageable parts. I told him that there 12 was none, that -- that I would not use it 13 for my customers because it had been 14 soaking wet and that it was going to 15 corrode because it was printed circuit 16 boards. 17 And, he said, I couldn't use it 18 anywhere? I said, no, sir. I said, I 19 mean, I can't, I said, because I've worked 20 too hard to build my reputation and the 21 company's reputation and, I said, I can't 22 use it. 23 And I offered to load it up, help him</p>	<p>1 that day? 2 A No, sir. 3 Q Did you talk with him on the phone after 4 that day? 5 A I believe I talked to -- it was either him 6 or somebody in his office. 7 Q Okay. 8 A No. I talked -- I called his office. John 9 had gave me the number, but I dealt mainly 10 through John and him. He relayed messages 11 to John. 12 Q Okay. Before we get to that, I want to ask 13 you the next contact you had with anyone 14 regarding your contents claim for Pioneer 15 Telephone Services after that meeting with 16 Bill Reaves that we've just discussed. 17 A I don't remember any. 18 Q Well, I thought you just said -- 19 A I mean, other than -- not with Bill. 20 Q No, I'm asking with anybody. Anybody 21 regarding your contents claim after that 22 meeting with Bill Reaves, who was the next 23 discussion with?</p>

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<p>1 A John</p> <p>2 Q Okay. And tell me what took place in that</p> <p>3 discussion and what was said</p> <p>4 A I was just wanting to know the status</p> <p>5 John told me that Bill -- that's his name,</p> <p>6 yeah, Bill That it was in the works and</p> <p>7 that he didn't see a problem. Said okay</p> <p>8 After nothing happened for a little</p> <p>9 while, I talked --</p> <p>10 Q Well, before you -- Okay I want to just</p> <p>11 make sure we've covered the conversation</p> <p>12 Is that the end of that conversation you</p> <p>13 had, the next conversation?</p> <p>14 A (Witness nods head up and down) With</p> <p>15 John I just called to get an update</p> <p>16 Q Okay. And do you remember when that was?</p> <p>17 A No, sir It was sometime after our</p> <p>18 meeting</p> <p>19 Q And how long, approximately, after that</p> <p>20 meeting do you believe that it was?</p> <p>21 A I don't remember</p> <p>22 Q You don't know whether it was a week or a</p> <p>23 month?</p>	<p>1 other discussion with John or Harold other</p> <p>2 than a discussion that a check was being</p> <p>3 processed?</p> <p>4 A No, sir, not to my recollection</p> <p>5 Q At that time, had you received a check from</p> <p>6 Auto-Owners for anything?</p> <p>7 A I believe I had received a check for the</p> <p>8 house</p> <p>9 Q At that time, had you received a check for</p> <p>10 anything regarding Pioneer Telephone</p> <p>11 Services?</p> <p>12 A I don't believe so.</p> <p>13 Q All right Now, then, the next -- Is that</p> <p>14 everything that was said in that</p> <p>15 conversation between you and Harold and</p> <p>16 John that you've just told me about?</p> <p>17 A Yes, sir, basically</p> <p>18 Q When was the next conversation?</p> <p>19 A The next day or two when there wasn't a</p> <p>20 check</p> <p>21 Q Okay And who was that conversation with?</p> <p>22 A John</p> <p>23 Q And did you call him or did he call you?</p>
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<p>1 A No, sir It was just a few days, I think</p> <p>2 Q Okay. And then you were about to start</p> <p>3 telling me about another conversation, I</p> <p>4 believe, that you had, the next</p> <p>5 conversation you had with anyone</p> <p>6 A Well, the next conversation was with John</p> <p>7 and Harold</p> <p>8 Q And do you know when that was?</p> <p>9 A No, sir It was sometime very shortly</p> <p>10 after that</p> <p>11 Q Okay. And what was the substance of that</p> <p>12 conversation between you and Harold and</p> <p>13 John?</p> <p>14 A John was supposed to be calling me back</p> <p>15 pretty quick. And he had just heard from</p> <p>16 Bill, if this is the time -- I think this</p> <p>17 was the time. He said that there was --</p> <p>18 that the check was being processed, and</p> <p>19 I -- we thought everything was okay</p> <p>20 Q And you don't remember the date of that</p> <p>21 conversation?</p> <p>22 A No, sir</p> <p>23 Q And did he tell you -- Did you have any</p>	<p>1 A I called him</p> <p>2 Q In each of these conversations you had with</p> <p>3 John, were you calling him?</p> <p>4 A No, he would call me and let know what was</p> <p>5 going on</p> <p>6 The call, the one about the check John</p> <p>7 made</p> <p>8 Q Okay. All right And you've told me</p> <p>9 everything that occurred in that</p> <p>10 conversation, correct?</p> <p>11 A Yes, sir</p> <p>12 Q All right And now this one-- this call</p> <p>13 you initiated, this next call after that</p> <p>14 conversation --</p> <p>15 A Yes, sir</p> <p>16 Q -- you initiated the call to John, and tell</p> <p>17 me what you discussed then</p> <p>18 A At about that time, it must have been</p> <p>19 around -- whenever he had gotten there --</p> <p>20 you know, Bill had come by -- it must have</p> <p>21 been around Tuesday or Wednesday Bill had</p> <p>22 said there was a problem, that it needed to</p> <p>23 have Tel-Com's name on it -- or I needed to</p>

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<p>1 A Yes, sir.</p> <p>2 Q Okay And down there -- And what does it</p> <p>3 say in the bottom left-hand corner of that</p> <p>4 draft?</p> <p>5 A In payment of building damage</p> <p>6 Q All right And what is the date of that</p> <p>7 draft, Mr. Williamson?</p> <p>8 A January 18th, 2005.</p> <p>9 Q All right Now, then, you -- we were</p> <p>10 discussing, one, about the check was</p> <p>11 being -- going to be -- or being processed</p> <p>12 and then a conversation you had with John</p> <p>13 where he said that Bill said there's a</p> <p>14 problem and somebody else to look at it</p> <p>15 And I believe you told me that the</p> <p>16 conversation where Bill said there's a</p> <p>17 problem, need somebody else to look at it</p> <p>18 was before your conversation you said you</p> <p>19 had with John about there being a check</p> <p>20 processed</p> <p>21 A The only problem -- The problem I'm talking</p> <p>22 about is the one where it had Pioneer -- to</p> <p>23 Pioneer He just said he wondered if there</p>	<p>1 change the name.</p> <p>2 Q Well, who said that?</p> <p>3 A Bill Bill told John, and John told me</p> <p>4 Q You didn't specifically have any</p> <p>5 conversation with Bill about that?</p> <p>6 A No, sir.</p> <p>7 Q You just heard there was a problem, that</p> <p>8 Bill told John there was a problem and that</p> <p>9 could somebody else look at it?</p> <p>10 A Uh-huh. (Positive response.)</p> <p>11 Q Yes?</p> <p>12 A Yes, sir. Yes, sir. I'm sorry</p> <p>13 Q And so then what you submitted in response</p> <p>14 to that was what's marked AO132 and 133,</p> <p>15 which is this Tel-Com States that it's a</p> <p>16 lightning affidavit, and it's -- it's</p> <p>17 signed K MacBracewell, and you've already</p> <p>18 testified earlier it was signed by Sheila</p> <p>19 A Yes, sir.</p> <p>20 Q His name was signed by Sheila.</p> <p>21 A Yes, sir.</p> <p>22 Q All right And Sheila being the woman that</p> <p>23 worked for both you -- at that time worked</p>
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<p>1 was anybody else I could put there That</p> <p>2 was the only problem that he saw And when</p> <p>3 I said that we had that, he said, okay, no</p> <p>4 problem He said, if you would, get that</p> <p>5 done and get it sent</p> <p>6 Q Okay And is that when you did the</p> <p>7 lightning affidavits?</p> <p>8 A Well, the second one We'd already done</p> <p>9 the one for Pioneer.</p> <p>10 Q The one for Pioneer -- Let me just get that</p> <p>11 correct</p> <p>12 A Okay</p> <p>13 Q Is that the document that's marked AO185 to</p> <p>14 190?</p> <p>15 A Yes, sir, I believe so</p> <p>16 Q And the second one is The second one is</p> <p>17 the one we discussed earlier today --</p> <p>18 A Here it is Tel-Com</p> <p>19 Q That is pages AO132 and 133?</p> <p>20 A Yes, sir</p> <p>21 Q And that's what you submitted in response</p> <p>22 to that conversation?</p> <p>23 A Yes, sir He said all -- we just needed to</p>	<p>1 for both you and for Tel-Com?</p> <p>2 A Yes, sir</p> <p>3 Q All right Then what was the next</p> <p>4 conversation you had after that? And I</p> <p>5 believe you -- because you got them out of</p> <p>6 order, the next conversation was John and</p> <p>7 you had a conversation that he said</p> <p>8 something to the effect that he understood</p> <p>9 a check was being processed</p> <p>10 A Uh-huh. (Positive response.) The first</p> <p>11 one would be -- it was 21 -- I think it was</p> <p>12 21,000 and something, something like that,</p> <p>13 and that -- that everything was okay</p> <p>14 Everything was being processed</p> <p>15 Q At that time, you hadn't received any check</p> <p>16 from Auto-Owners, had you?</p> <p>17 A I'm not -- I may have got -- had one for</p> <p>18 the home. I don't remember what the date</p> <p>19 was on the house</p> <p>20 Q Well, what I'm talking about, at that time,</p> <p>21 you hadn't received a check from</p> <p>22 Auto-Owners for anything regarding Pioneer</p> <p>23 Telephone Services' --</p>

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1 A Yes, sir, and none after that.
2 Q Okay.
3 A I mean, no -- no any other kind of
4 discussion.
5 Q All right. At this time, did you still
6 have the equipment -- the contents
7 equipment in your shed at your house of
8 Pioneer Telephone Services?
9 A I'm not sure.
10 Q Did you --
11 A I don't believe that I did because John had
12 told me -- because I was needing space for
13 Christmas, and John had told me that since
14 three adjusters had looked at it, taken
15 pictures of it, and none of them had told
16 them, had told me that I had to keep it,
17 that he didn't see a problem with throwing
18 it away because everybody else's claims had
19 been taken care of.
20 Q And who told you this?
21 A John Tomberlin.
22 Q Okay. Well, I've asked you in detail every
23 conversation you had with them, and that's

1 Q The one about where you decided -- well,
2 when I asked you about the disposal of the
3 equipment and you told me about the
4 conversation you had.
5 A With John?
6 Q Yeah. Is that who it was with, with John?
7 A Yes, sir.
8 Q Okay.
9 A Because I told him I needed the room. And
10 I asked what -- was Bill ever going to come
11 get it or what was they going to do with
12 it, did I need to throw it away, whatever.
13 And John, that's when he said that since
14 the adjusters had come, took pictures of
15 it, I had taken pictures of it and
16 everybody and -- and he said the check was
17 being done -- that's right. The best I
18 remember, that's when it was.
19 Q And you were present at both John's and
20 Harold's deposition, weren't you?
21 A Yes, sir.
22 Q And you heard their testimony in those
23 depositions, didn't you?

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1 the first time I've heard anything about
2 that conversation, right?
3 A I guess.
4 Q Isn't that the first time in your
5 deposition I've heard anything about that
6 conversation?
7 A I'm not sure.
8 Q Okay. Well, in this list of conversations
9 you've told me, when did that conversation
10 take place?
11 A I'm not sure. I'm not sure. It was before
12 Christmas. I do know. I do know. I do
13 remember.
14 Q Okay. When was it?
15 A It was when the check was being done. That
16 was -- it was right -- it was right during
17 then, because John said it had been cleared
18 or it was being processed, whatever you
19 call it.
20 Q Okay. And is it your testimony here today
21 that -- Well, and tell me again what that
22 discussion was and who you had it with.
23 A Which one?

1 A Yes, sir.
2 Q And you understood that both of them
3 said -- it's my recollection is that one or
4 both of them said they didn't have any
5 conversation with you about the disposal of
6 the equipment until after you had already
7 disposed of it. Is that your basic
8 recollection?
9 A I don't remember what they said, but I -- I
10 know Harold did a complete turnaround,
11 but
12 Q Well, is it your --
13 A I remember John -- I mean, John telling
14 about the \$21,000 check that was being
15 processed.
16 Q And what I'm asking you is, did you discuss
17 the disposal of the equipment -- and when I
18 say equipment, the contents equipment of
19 Pioneer Telephone Services, did you discuss
20 disposing of that equipment prior to your
21 disposing of it?
22 A Yes, sir.
23 Q Okay. Tell me what that conversation was.